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September 15, 2010

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Notice

ET Docket No. 04-186, ET Docket No. 2-380, ET Docket No. 10-152, ET Docket No. 06-94

Dear Ms. Dortch,

I met today with Douglas Sicker and discussed the 9/2/10 filing in the above dockets by Adaptrum, Inc./ HaiyunTang
(<http://fjallfoss.fcc.gov/ecfs/document/view?id=7020910901>)

I explained how the R-6602 model used to compute Grade B contours uses only the Δh factor explained in 47 C.F.R. 73.699 Figure10d and is based on only 10 points on a radial covering only distances between 10 and 50 km from the transmitter. All other terrain data is ignored. The Δh thus found is then used in 47 C.F.R. 73.699 Figure10e to find a frequency dependent correction factor. While this was a reasonable approach in 1966 when this model was developed by FCC and mechanical desk top calculators were used along with paper maps, the model proposed in Docket 10-152 is much more sophisticated and accurate and should be used as an optional alternative to the R-6602 approach.

The case of Monterey, CA is a glaring example of a city with almost no over-the-air TV reception, as shown by the FCC's dtv.gov site, and yet almost no white space availability due to the unrealistic R-6602 predictions in mountainous terrain.

Sincerely,

Michael J. Marcus, Sc.D., F-IEEE
Director

cc: Douglas Sicker